LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC

AND BLYTHE SOLAR POWER PROJECT UNIT 4, LLC

Defendants.

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Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and
SOUTHWESTERN POWER GROUP II, LLC (collectively, "MMR") and Defendants STA
DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC.,
CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC,
BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT
UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR
POWER PROJECT UNIT 4, LLC (collectively, the "STAD Defendants") respectfully request
that the Court extend the time for the STAD Defendants to respond to the Amended Complaint,
filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011,
by two weeks from January 10, 2012 to January 24, 2012

On November 4th and 14th, the parties requested, and this Court later granted, a one-week extension of time for the STAD Defendants to respond to the Amended Complaint because the parties were in advanced stages of settlement discussions. On November 22nd, December 1st, and December 27th, the parties requested, and this Court later granted, extensions of two weeks due to continued progress in settlement negotiations. The parties continue to be hopeful that they will execute a settlement agreement forthwith. Due to the continued progress in reaching a settlement, the parties request a two-week extension of the time for the STAD Defendants to respond to the Amended Complaint. The parties' request will have a *de minimis*, if any, impact on the schedule. In the interests of judicial economy, the parties therefore request that the Court extend the STAD Defendants' time to respond to the Amended Complaint by two weeks from January 10, 2012 to January 24, 2012.

1	Dated: January 6, 2012 MILBANK, TWEED, HADLEY & McCLOY LLP
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13	Palo Verde Solar II, LLC, Blythe Solar Power Project Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,
	Blythe Solar Power Project Unit 3, LLC and Blythe Solar
14	Power Project Unit 4, LLC
15	Dated: January 6, 2012 WATT, TIEDER, HOFFAR & FITZGERALD, LLP
16	By: /s/ Nicholas A. Merrell
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22	Attorneys for Plaintiffs MMR Group, Inc., MMR Power Solutions, LLC and Southwestern Power Group II, LLC
23	PURSUANT TO STIPLII ATION IT IS SO ORDERED TES DISTRICE
24	PURSUANT TO STIPULATION, IT IS SO ORDERED TES DISTRICT
	Dated:1/10/12
25	STATES PROPERED IVENGE
26	IT IS SO ORDERED IN PODGE
27	
28	Judge Edward M. Chen
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